

Preliminary Data Gap Analysis
Pebble Project Environmental Impact Statement

Resource: Spill Risk			
Project Component	Analysis Component	Description	Data Recommendations
Mine Site	Effects Analysis	Tailings dam failure scenarios that qualify as low probability, high-consequence events are needed to assess impacts. NEPA guidance discourages worst case scenarios.	An early stage tailings dam risk assessment/failure modes effects analysis should be conducted to determine the scenarios for the EIS. AECOM can host the meeting and facilitate. Attendees should include USACE, Alaska Dam Safety, AECOM dam/mining engineers and PLP.
Transportation Corridor and Amakdedori Port	Effects Analysis	Additional detail on diesel storage and transport will be required to assess spill risk.	<p>It is anticipated that scoping will identify risk of diesel spills as a concern to be addressed in the EIS. Additional detail from PLP on storage and transport of diesel will be required (storage tank numbers and capacity, spill prevention and response strategies, truck speed limits).</p> <p>A study should be conducted that reviews and summarizes ADEC and USCG historical spills and makes a projection of spills for the proposed project. It should include an oil spill trajectory and weathering estimate.</p> <p>PLP should provide proposed spill prevention measures and response tactics.</p>
Transportation Corridor and Amakdedori Port	Effects Analysis	Additional detail on concentrate storage and transport will be required to assess spill risk.	It is anticipated that scoping will identify risk of concentrate or leachate spills as a concern to be addressed in the EIS. Additional detail from PLP on design of concentrate shipping containers and efficacy of covers to prevent fugitive dust and rain water

			<p>accumulation/potential for leachate to form and escape will likely be required.</p> <p>A study should be conducted that reviews and summarizes accident and spill data from concentrate trucking and barging.</p> <p>PLP should provide proposed spill prevention measures and response tactics.</p>
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